

EXHIBIT 2

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1 SUPERIOR COURT OF THE STATE OF CALIFORNIA
2 IN AND FOR THE COUNTY OF SAN FRANCISCO

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4 COMMUNITIES FOR A : CIVIL NO.
5 BETTER ENVIRONMENT, a : 997013
6 Californian Non-Profit
7 Corporation, on behalf :
8 of the General Public,
9 Plaintiff, :
-vs- :
10 UNOCAL CORPORATION, a :
11 Delaware corporation, :
12 et al., :
13 Defendants. :
14 * * *

15 SUPERIOR COURT OF THE STATE OF CALIFORNIA
16 IN AND FOR THE COUNTY OF SAN FRANCISCO

17 * * *

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19 SOUTH TAHOE PUBLIC : CIVIL NO.
20 UTILITY DISTRICT, : 999128
21 Plaintiff, :
22 -vs- :
23 ATLANTIC RICHFIELD :
24 COMPANY ("ARCO"); ARCO :
25 CHEMICAL COMPANY; :
26 SHELL OIL COMPANY; :
27 et al., :
28 Defendants. :
29 * * *

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31 Tuesday, September 19, 2000

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11:13:21 1 in the Tahoe case.
11:13:23 2 This deposition is also
11:13:25 3 being taken in CBE, and the
11:13:28 4 agreement in that case will bind
11:13:29 5 those parties.
11:13:31 6 MR. HOFFMAN: Okay.
11:13:32 7 MR. MILLER: I'm not party
11:13:37 8 to that agreement.

9 * * *

10 EXAMINATION
11:13:39 11 * * *
12 BY MR. MILLER:
11:13:40 13 Q. Could I have your name and
11:13:41 14 address, please?
11:13:42 15 A. My name's Gene Capaldi. My
11:13:44 16 address is 707 Main Road, M-A-L-I-N,
11:13:49 17 Newtown, one word, Square, Pennsylvania
11:13:51 18 19073.
11:13:54 19 Q. Who is your current
11:13:54 20 employer?
11:13:55 21 A. I'm retired.
11:13:57 22 Q. And prior to your
11:13:59 23 retirement, who was your employer?
11:14:02 24 A. Lyondell Chemical company.

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EUGENE CAPALDI

13

11:14:04 1 Q. When did you retire from
11:14:05 2 Lyondell?
11:14:06 3 A. The end of July 1999.
11:14:13 4 Q. And for how many years did
11:14:14 5 you work for the company?
11:14:16 6 A. A little over 36 years.
11:14:19 7 Q. And of course when you first
11:14:21 8 went to work for the firm, what was it
11:14:23 9 known as?
11:14:24 10 A. Atlantic Refining.
11:14:28 11 Q. And what was your position
11:14:29 12 with them?
11:14:31 13 A. I was a research chemist.
11:14:37 14 Q. Could you briefly describe
11:14:38 15 your educational background after high
11:14:40 16 school for us, please?
11:14:42 17 A. Yes. I got my batch -- B.A.
11:14:45 18 from the University of Pennsylvania
11:14:46 19 1959, my M.S. in organic chemistry from
11:14:52 20 the University of Delaware in 1961 and my
11:14:55 21 Ph.D. in organic chemistry from the
11:14:58 22 University of Delaware, 1964.
11:15:04 23 Q. And is that when you went to
11:15:07 24 work for Atlantic Refining?

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EUGENE CAPALDI

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11:15:09 1 A. I started working for
11:15:10 2 Atlantic Refining in September of 1963.

11:15:18 3 Q. And were you continuously
11:15:20 4 employed by them through the date that
11:15:21 5 you retired?

11:15:22 6 A. Yes, I was.

11:15:30 7 Q. When did you start your work
11:15:31 8 with what was then known as ARCO Chemical
11:15:36 9 Company on MTBE?

11:15:39 10 A. It was probably in the late
11:15:41 11 '70s.

11:15:44 12 Q. And what type of work were
11:15:45 13 you doing at that time, sir?

11:15:50 14 A. On the MTBE, I was -- my
11:15:53 15 position was probably toxicology
11:15:56 16 coordinator for the ARCO Chemical.

11:16:06 17 Q. Have -- did you receive any
11:16:09 18 educational courses in the field of
11:16:11 19 toxicology?

11:16:12 20 A. No.

11:16:15 21 Q. As I understand it, your
11:16:17 22 educational background consists
11:16:20 23 principally of organic chemistry; is that
11:16:23 24 correct?

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